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(D. P. Romani)

COMMUNITY BANK

WHEATON / GLEN ELLYN

September 27, 2005

FDIC-San Francisco Regional Office
Regional Director John F. Carter
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105

We read with great trepidation of Wal*Mart's attempt to enter banking through the use of an industrial bank charter. Known for aggressive business tactics and strategies as a retailer, Wal*Mart's "foot in the door" with such an ILC gives them the basis to open a US wide banking network that would adversely impact retail lending throughout the nation.

Wal*Mart has a history of de-stabilizing small communities with its often criticized business and sales practices. These tactics and strategies and Wal*Marts' power as the world's largest retailer has destroyed a number of small groceries, pharmacies and florists. Community banks, the lifeblood of small business lending, would be subject to these well documented business practices and, we fear, severely and adversely impacted by Wal*Mart entering the banking field.

Additionally, ILCs were never intended to be a charter for a large nationwide banking system offering services virtually indistinguishable from commercial Banks. As such, with no oversight from the Federal Reserve or other national banking regulator, the safety and soundness of this ILC Charter and the system as a whole is, in our judgment, at jeopardy. ILCs represent a parallel but unequal and uncomfortably semi-regulated banking system that is detrimental to the safety and soundness of the banking system as a whole. It is time to shut this loophole, if at all possible.

Historically, it has been of great concern to the industry, the government, and concerned and knowledgeable bankers, that commerce and banking be and remain separate. Congress reaffirmed this separation with the recently enacted Gramm-Leach-Bliley Act.

Customers will find less opportunity for choice among banking facilities, particularly in small rural communities. Additionally, giving Wal*Mart authority to do banking would set the stage for unprecedented concentration of economic power.

Other than restaurants and autos, Wal*Mart controls 8% of all retail sales. Because of their history, we can easily see them abusing their economic power by requiring, among other things, that all their supplier's bank with them.

FDIC

September 27, 2005

Page Two

The difficulty with economic or political power is the inability, because of the nature of man, to keep power from being abused. Lord Acton, a British historian of the late 19th/early 20th century once quite memorably said, "Power tends to corrupt; absolute power corrupts absolutely."

We respectfully request that you deny Wal*Mart's application for insurance on any foray by them into the field of banking.

ON BEHALF OF THE
BOARD OF DIRECTORS



Donald H. Fischer
Chairman, President & CEO